

EXHIBIT 24

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:)
)
THE FINANCIAL OVERSIGHT)
AND MANAGEMENT BOARD) Case No.
FOR PUERTO RICO,) 17 BK 3283-LTS
)
as representative of)
)
THE COMMONWEALTH OF)
PUERTO RICO, et al.,)
)
Debtors.)

-----)
In re:)
)
THE FINANCIAL OVERSIGHT) Case No.
AND MANAGEMENT BOARD) 17 BK 4780-LTS
FOR PUERTO RICO,)
)
as representative of)
)
THE PUERTO RICO)
ELECTRIC POWER)
AUTHORITY,)
)
Debtor.)

-----)
REMOTE VIDEOTAPED 30(b)(6) DEPOSITION OF
JOSELINE NAVEL ESTRADA RIVERA
San Juan, Puerto Rico
Tuesday, May 30, 2023

Reported By:
CATHI IRISH, RPR, CRR, CLVS

1 ESTRADA

2 asking about the 2022 PREPA fiscal plan.

3 Was there any assessment
4 performed of whether it was realistic that
5 there would be a reduction in electricity 03:17:50PM
6 consumption of 30 percent by 2040?

7 MR. INGERMAN: Objection to the
8 form. You can answer.

9 THE WITNESS: The projections we
10 prepared for the fiscal plan are in 03:18:25PM
11 accordance with current laws and
12 regulations.

13 BY MR. MAYRELL:

14 Q. Was there any assessment of
15 whether the 30 percent reduction was, in 03:18:42PM
16 fact, likely to be achievable?

17 MR. INGERMAN: Objection, form.

18 THE WITNESS: In the case, well
19 in the work I performed such
20 assessment was not performed. 03:19:16PM

21 BY MR. MAYRELL:

22 Q. Did LUMA perform any such
23 assessment?

24 MR. INGERMAN: Objection -- hold
25 on, objection, form, foundation. 03:19:24PM

1 ESTRADA

2 THE INTERPRETER: Thank you.

3 THE WITNESS: From my standpoint,
4 I cannot answer that question because
5 personally I did not perform an
6 analysis as to whether this is
7 realistic or not and I do not know
8 whether any other area has done so.

03:22:04PM

9 BY MR. MAYRELL:

10 Q. You indicated that another load 03:22:20PM
11 modifier concerned the adoption of
12 electric vehicles; is that right?

13 A. Yes, that is correct.

14 Q. And base case load forecast that
15 was prepared for the 2022 fiscal plan, is 03:22:49PM
16 there a point at which there is no
17 additional adoption of electric vehicles?

18 MR. INGERMAN: Objection to the
19 form. You can answer.

20 THE WITNESS: The projections 03:23:38PM
21 regarding EVs was very similar to the
22 model used for the IRP, reached out
23 the year 2040 and from that point on,
24 we did not have a conceptual framework
25 to carry out any projections beyond 03:24:07PM

1 ESTRADA

2 a site translation when you're done
3 reading the paragraph. If it's not
4 going to be word for word --

5 MR. MAYRELL: It is going to be 03:44:03PM
6 word for word so I'll do that now.

7 BY MR. MAYRELL:

8 Q. "An alternative forecast based on
9 a bottom-up approach, that uses the
10 current situation in Puerto Rico as the 03:44:09PM
11 starting point, that is not constrained by
12 Act 17, that incorporates the latest data
13 available on current and future costs, and
14 that is supported by driver specific
15 models provides a perspective on a 03:44:21PM
16 potentially different load forecast (the
17 alternative forecast)."

18 So I read the first paragraph.

19 Have you -- are you familiar with
20 what's referred to here as the alternative 03:45:36PM
21 forecast?

22 MR. INGERMAN: Objection,
23 foundation, asked and answered. You
24 can answer it again.

25 THE WITNESS: No, sir. 03:45:53PM

1 ESTRADA

2 BY MR. MAYRELL:

3 Q. So is it fair to say then you
4 don't know whether anyone at LUMA
5 contributed to the preparation of this 03:46:04PM
6 alternative forecast?

7 MR. INGERMAN: Objection, form,
8 foundation. You can answer.

9 THE WITNESS: No, I have no
10 knowledge, sir. 03:46:20PM

11 BY MR. MAYRELL:

12 Q. In preparing to testify today,
13 did you ask anyone at LUMA whether they
14 contributed to the preparation of this
15 alternative forecast? 03:46:32PM

16 A. No, sir.

17 Q. At any point, did LUMA receive
18 any communication from the oversight board
19 stating a view on the accuracy of the base
20 forecast? 03:47:26PM

21 MR. INGERMAN: Objection, form.
22 You can answer.

23 THE WITNESS: It is usual for
24 discussions to be held with FOMB
25 personnel with regard to modifiers and 03:48:05PM

ESTRADA

on this occasion, I believe, I am not
sure, I believe that we had -- that I
was involved in two or three meetings,
I'm not sure, to discuss the
projections, not only this one but
also the modifiers and what was
discussed in the meetings was more, it
was more a matter of to indicate, to
explain the methodology used by LUMA
to draw up the projections but I'm
not -- we were not required, at least
me directly, I was not required any
other modification.

03:48:41PM

03:49:14PM

BY MR. MAYRELL:

03:49:44PM

Q. Besides the information that you
were conveying to the oversight board
regarding the base case model, did the
oversight board tell you anything about
their views of the base case or the load
modifiers?

03:49:59PM

MR. INGERMAN: Objection to --

THE INTERPRETER: Sorry.

MR. INGERMAN: That's okay.

THE INTERPRETER: Views of the

03:50:13PM